

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 24-CR-20255-WPD

UNITED STATES OF AMERICA

v.

**PATRICK BOYD and
CHARLES BOYD,
Defendants.**

CHARLES BOYD'S PROPOSED VOIR DIRE QUESTIONS

Charles Boyd, through undersigned counsel, submits the following voir dire questions for the Court's consideration to supplement the Court's standard voir dire dialogue with potential jurors:

1. Do any potential jurors have familiarity with what are commonly known as HIV drugs?
2. Do any of the potential jurors own any pharmaceutical stocks?
3. Do any potential jurors purchase prescription drugs on the internet?
4. Do any potential jurors believe that prices of branded prescription drugs in the United States are too high?
5. Do any potential jurors have opinions why drug prices are too high?
6. Do any potential jurors have more than a general knowledge of the workings of what is known as the supply chain of prescription drugs in the United States?
7. This case is being prosecuted by members of the United States Department of Justice. Do any potential jurors have any opinions concerning the Department of Justice that they could not put aside if they are chosen as a juror in this case?

8. It is anticipated that there will be a witness called to testify in this case from the Food and Drug Administration, commonly known as the FDA.
 - a. Do any potential jurors have any opinions concerning the FDA that they could not put aside if they are chosen as a juror in this case?
 - b. Are there any potential jurors who are involved in professions or businesses that are regulated by the FDA?
 - c. If 8b is answered in the affirmative, what businesses or professions?
 - d. If 8b is answered in the affirmative, is there anything about their FDA relationship that could not be put aside if chosen as a juror?
9. It is anticipated that there will be numerous documents introduced as evidence in this case.
 - a. Do any potential jurors have difficulty reading the contents of documents?
 - b. Do any potential jurors have difficulty reading English?
10. The Court will generally conduct trial between 9 a.m. until 5 p.m. Monday through Friday, except on holidays. Will any potential juror have any difficulty attending Court during those hours?
11. Is there anything about you that you believe the attorneys should know about your qualifications or ability to sit on the jury in this case?
12. Is there any question or area of inquiry that has not been addressed that you believe would be beneficial for the parties to more fully understand your qualifications to sit on this jury?
13. Do you believe that you could set aside any bias or prejudice that you might have and sit as a fair juror in this case?

14. The Court will instruct you that the only evidence that you can consider in this case is evidence that is presented during trial. Can you resist any temptation that you might have to conduct independent investigation or research?
15. Should you become aware that any juror has conducted independent research or investigation, or violated any order of this Court, will you have any reluctance to report that issue to the Court?

Dated: September 16, 2025

By: s/ Bruce A. Zimet, Esq.

Florida Bar No. 0225053

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Florida by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: September 16, 2025

By: s/ Bruce A. Zimet, Esq.

Florida Bar No. 0225053

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